

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

RELENTLESS INC., et al.

Plaintiffs,

v.

**U.S. DEPARTMENT OF COMMERCE,
et al.**

Defendants.

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Case No. 1: 20-cv-00108-WES-PAS

**PLAINTIFFS' MOTION FOR RULE 16
CONFERENCE**

The Plaintiffs Relentless Inc. (“Relentless”), Huntress Inc. (“Huntress”), and Seafreeze Fleet LLC (“Seafreeze”) request that the Court schedule an Initial Scheduling Conference pursuant to LR Cv 16. In support thereof, Plaintiffs state as follows:

1. This case was filed on March 4, 2020. (Dkt. No. 1).
2. The Defendants filed a motion to transfer venue on April 3, 2020, which is now fully briefed by the parties. (Dkt. Nos. 10-12).
3. The Defendant Answered the Complaint on April 30, 2020. (Dkt. No. 13).
4. No initial scheduling conference has yet been docketed, but one would be helpful to obtain the benefits contemplated by Rule 16 of the Federal Rules of Civil Procedure.
5. Prior to filing this motion Plaintiff’s counsel contacted Defense counsel for the Government’s view of this motion and was authorized to state to the Court that “Defendants defer to the Court’s decision on whether a Rule 16 conference is necessary, but state that a Rule 16 conference is premature at this time in light of the pending motion to transfer (ECF 10).”
6. Both Counsel request that such conference be conducted by teleconference or video conference given the ongoing COVID-19 situation.

Dated: July 9, 2020

Respectfully submitted,

/s/ Kevin J. Holley
Kevin J. Holley, Esq. #4639
Holley Law LLC
33 College Hill Road, Ste. 25C
Warwick, RI 02886
Phone: (401) 521-2622
kevin@holleylawllc.com

John J. Vecchione (admitted *pro hac vice*)
Kara Rollins (admitted *pro hac vice*)
New Civil Liberties Alliance
1225 19th Street NW, Ste. 450
Washington, DC 20036
Phone: (202) 869-5210
john.vecchione@ncla.legal
kara.rollins@ncla.legal

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on July 9, 2020, I electronically filed the foregoing Motion for a Rule 16 Conference using the CM/ECF system, which will send electronic notification of such filing to all counsel of record.

/s/ Kevin J. Holley